1 Honorable Ricardo S. Martinez 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 ROBERT BOULE, 9 No. 2:17-cv-00106-RSM Plaintiff, AGENT EGBERT'S MOTION TO SEAL 10 v. NOTE ON MOTION CALENDAR: 11 ERIK EGBERT and JANE DOE EGBERT July 13, 2018 and their marital community, 12 Defendants. 13 14 ERIK EGBERT, 15 Counterclaimant, 16 v. 17 ROBERT BOULE, 18 Counterdefendant. 19 Pursuant to Local Civil Rule 5(g) and the Stipulated Protective Order entered in this case 20 (Dkt. 53), Agent Erik Egbert moves the Court to seal the following documents and information 21 that have been designated by Plaintiff and the United States as confidential: 22 23

AGENT EGBERT'S MOTION TO SEAL

(No. 2:17-cv-00106-RSM) - 1

LAW OFFICES OF

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1	1. An unredacted version of Agent Egbert's Motion for Summary Judgment;
2	2. An unredacted version of the Declaration of Agent Egbert;
3	3. The Declaration of Anthony J. Neupert, CPA, with exhibits;
4	4. The Declaration of Dennis Chong, M.D., with exhibit; and
5	5. An unredacted version of Exhibits A–C to the Declaration of Geoffrey M.
6	Grindeland in Support of Agent Egbert's Motion for Summary Judgment.
7	Defense counsel met-and-conferred by telephone with Plaintiff's attorney Greg Boos on
8	June 20 and Assistant U.S. Attorney Kristin Johnson on July 3 in an attempt to reach agreement
9	on the need to file the document under seal, to minimize the amount of material filed under seal,
10	and to explore redaction and other alternatives to filing under seal.
11	In response to this motion, Plaintiff and the United States will have the opportunity to
12	explain why these documents should be kept under seal in compliance with Local Civil Rule
13	5(g)(3)(B).
	DATED: July 5, 2018
14 15	MILLS MEYERS SWARTLING P.S. Attorneys for Agent Erik Egbert
16	By: <u>s/Geoffrey M. Grindeland</u>
17	Geoffrey M. Grindeland, WSBA No. 35798 Nikki C. Carsley, WSBA No. 46650
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-0	LAW OFFICES OF AGENT EGBERT'S MOTION TO SEAL MILLS MEYERS SWARTLING P.

(No. 2:17-cv-00106-RSM) - 2

1	CERTIFICATE OF SERVICE
2	I certify that I electronically filed the foregoing document with the Clerk of the Court
3	using the CM/ECF system which will send notification of such filing to:
4	Breean Lawrence Beggs: bbeggs@pt-law.com, hhoffman@pt-law.com, lswift@pt-
5	law.com
6	Gregory Donald Boos: gdboos@cascadia.com, gdboos@gmail.com
7	W. Scott Railton: srailton@cascadia.com
	Kristin Berger Johnson: kristin.b.johnson@usdoj.gov, amy.hanson@usdoj.gov,
8	CaseView.ECF@usdoj.gov, ECF-Civ.USAWAW@usdoj.gov, hana.yiu@usdoj.gov
9	I further certify that I mailed a true and correct copy of the foregoing to the following
10	non-CM/ECF participants by U.S. Mail:
11	N/A
12	DATED: July 5, 2018
13	/W E' 11
14	<u>s/Karrie Fielder</u> Karrie Fielder
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	LAW OFFICES OF AGENT EGBERT'S MOTION TO SEAL MILLS MEYERS SWARTLING P

(No. 2:17-cv-00106-RSM) - 3